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10 *Attorneys for Plaintiffs*

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**

15 SWEET PEOPLE APPAREL, INC. d/b/a
16 MISS ME, a California corporation, et al.,

17 Plaintiffs,

18 v.

19 PHOENIX FIBERS, INC., an Arizona
20 corporation, et al.,

21 Defendants.

Case No.: 2:16-cv-00940-TJH-JC

Hon. Terry J. Hatter Jr.

22 **DECLARATION OF MATTHEW**
23 **T. SALZMANN IN OPPOSITION**
24 **TO DEFENDANT PHOENIX**
25 **FIBERS, INC.'S MOTION FOR**
26 **SEPARATE TRIALS**

27 Date: August 21, 2017
28 Time: Under submission
Location: Courtroom 9B
First Street Courthouse

1 I, Matthew T. Salzmann, declare as follows:

2 1. I am a member of the law firm of Arnold & Porter Kaye Scholer LLP,
3 counsel for record for plaintiffs Sweet People Apparel, Inc. d/b/a Miss Me, and
4 RCRV, Inc. d/b/a Rock Revival (collectively "Plaintiffs"). I have personal
5 knowledge of the facts set forth below and, if called as a witness, could and would
6 competently testify thereto.

7 2. I respectfully submit this declaration in support of Plaintiffs' opposition
8 to defendant Phoenix Fibers, Inc.'s Motion for Separate Trials.

9 3. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from
10 the deposition transcript of defendant U.S. General Export, Inc.'s Rule 30(b)(6)
11 corporate representative, Nellie Sanchez, which took place on February 20, 2017.

12
13 I declare under the penalty of perjury under the laws of the United States of
14 America that the foregoing is true and correct.

15 Executed this 31st day of July 2017 at New York, New York.

16
17 /s/ Matthew T. Salzmann

18 MATTHEW T. SALZMANN
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